

	Pride Pak Canada Ltd.	Revision No	A
		Code	P-AODA-004
		EffectiveDate	01/06/2026

MULTI-YEAR ACCESSIBILITY PLAN 2026 - 2031

1. Purpose

This Multi-Year Accessibility Plan sets out Pride Pak Canada Ltd.'s strategy for the period 2026 to 2031 to prevent and remove barriers to accessibility for persons with disabilities and to meet all requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and Ontario Regulation 191/11 - the Integrated Accessibility Standards Regulation (IASR). This plan is required under Ontario Regulation 191/11 section 4 for all private sector organisations with 50 or more employees. The governing policy for all accessibility obligations is P-AODA-001.

2. Scope

This plan covers all four AODA standards applicable to Pride Pak Canada Ltd. - Customer Service, Information and Communications, Employment and Design of Public Spaces - across all operations at 6768 Financial Drive, Mississauga, ON L5N 7J6. It applies to all employees, customers, suppliers, contractors, visitors and any other person who interacts with Pride Pak Canada Ltd. in any capacity. The Transportation Standard does not apply to Pride Pak Canada Ltd.

3. Accessibility Compliance History and Why This Plan Begins in 2026

Pride Pak Canada Ltd. is subject to AODA obligations, including the requirement to file periodic Accessibility Compliance Reports, as an organisation with 50 or more employees. For a period of time prior to 2026, certain accessibility compliance reporting cycles were not filed, and a documented Multi-Year Accessibility Plan was not established or published during that period.

In 2026, Pride Pak Canada Ltd. identified this compliance gap through an internal review and initiated a comprehensive remediation programme. This Multi-Year Accessibility Plan 2026 - 2031 is the foundation of that remediation. Pride Pak Canada Ltd. is using this year to establish, in full, the documentation, training, website accessibility and physical accessibility programme required under the AODA, and to bring its accessibility compliance reporting up to date.

Pride Pak Canada Ltd. acknowledges this history transparently in this plan so that the scope and urgency of the 2026 remediation programme is properly understood by all those responsible for implementing it, and so that future reviews of this plan can be assessed against an honest account of where the company's accessibility programme actually began.

4. Why This Plan Covers Five Years

Ontario Regulation 191/11 section 4 requires organisations with 50 or more employees to establish a multi-year accessibility plan and to review and update it at least once every five years. The five-year period from 2026 to 2031 reflects the year in which Pride Pak Canada Ltd. has established its current AODA compliance programme, addressing both its ongoing obligations and the compliance history described in Section 3 above. This plan will be fully reviewed and renewed by 2031.

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5. Statement of Commitment

Pride Pak Canada Ltd. is committed to developing, implementing and maintaining this Multi-Year Accessibility Plan in a manner that reflects our core values of dignity, independence, integration and equal opportunity for persons with disabilities. We will review and update this plan at least once every five years and will report on progress at every annual Management Review Meeting. This plan is published on the Pride Pak Canada Ltd. website at www.pridepak.com and is available in accessible formats upon request at no cost.

6. Programme Overview - Where We Are in 2026

Pride Pak Canada Ltd. launched its comprehensive AODA compliance programme in 2026 to establish the full documentation, training, website accessibility and physical accessibility programme required under the AODA. The programme has been structured to deliver full documentation compliance, mandatory training and website accessibility (including WCAG 2.0 Level AA conformance and Multi-Year Plan publication) by July 2026, and a systematic physical accessibility audit by October 2026, with ongoing physical remediation, verification and continuous improvement through 2027 and beyond. The following have been completed or are on track for completion as part of the foundation of the programme:

- P-AODA-001 AODA Accessibility Policy - Complete
- P-AODA-002 Accessible Feedback Mechanism - Complete
- P-AODA-003 Accessible Formats and Communication Supports - Public - Complete
- P-AODA-004 Multi-Year Accessibility Plan published on www.pridepak.com - July 2026 - Complete
- P-AODA-005 Accessible Recruitment Statement and Procedure - Complete
- P-AODA-006 Accessible Formats for Employees - Internal - Complete
- P-AODA-007 Individualized Emergency Response Information and SOP - Complete
- P-AODA-008 Individual Accommodation Plan Procedure - Complete
- P-AODA-009 Return to Work Process and Plan - Complete
- P-AODA-010 AODA Training Content and Training Record - Complete
- P-AODA-011 Physical Accessibility Maintenance SOP - Complete
- AODA Training delivered to all 135 employees in phases across June 2026, completed by month end - Complete
- WCAG 2.0 Level AA website technical assessment and remediation - July 2026 - Complete
- Physical Accessibility Barrier Checklist AODA-CHK-001 - Full facility audit scheduled October 2026 - In Progress
- 2023 AODA Compliance Report - Filed by 15 July 2026
- 2026 AODA Compliance Report - To be filed by 31 December 2026

7. Accessibility Plan - Goals, Actions and Timelines

The following plan sets out all accessibility goals, actions and timelines across the five-year period 2026 to 2031, organised by year. Progress is reviewed at every Management Review Meeting and this plan is updated annually to reflect achievements and any new requirements.

Note on quarter references used in this plan: Q1 refers to January-March, Q2 to April-June, Q3 to July-September, and Q4 to October-December of the stated year.

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AODA Standard	Accessibility Goal	Actions and Initiatives	Responsible Person	Target Timeline	Status
YEAR 1 - 2026: FOUNDATION, FULL DOCUMENTATION AND COMPLIANCE REPORTING					
Customer Service	Establish a formal written Accessibility Policy covering all applicable AODA standards and communicate it to all employees and the public.	Implement P-AODA-001 AODA Accessibility Policy. Communicate to all 135 employees at induction.	MR	June 2026	Complete
Customer Service	Establish a formal accessible feedback mechanism through which any person may provide accessibility feedback through multiple channels.	Implement P-AODA-002 Accessible Feedback Mechanism. Activate all feedback channels including suggestion box, email, telephone and in-person. Maintain AODA-LOG-001.	MR	June 2026	Complete
Info & Comms	Establish a documented procedure for providing accessible formats and communication supports to the public and to employees on request at no cost.	Implement P-AODA-003 (public) and P-AODA-006 (employees). Notify public on website and at reception. Activate AODA-LOG-002.	MR	June 2026	Complete
Info & Comms	Develop and publish the Multi-Year Accessibility Plan 2026-2031 on the company website as required under O.Reg 191/11 section 4.	Develop P-AODA-004. Publish on www.pridepak.com. Provide in accessible formats on request.	MR / Web Team	July 2026	Complete
Employment	Ensure all job postings notify applicants that accommodations are available and that the recruitment process is fully accessible at every stage.	Implement P-AODA-005 Accessible Recruitment Statement. Add accommodation statement to all job postings. Complete FORM-AODA-005 before every posting.	MR	June 2026	Complete

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Employment	Establish documented processes for Individual Accommodation Plans and Return to Work plans for employees with disabilities.	Implement P-AODA-008 IAP Procedure and FORM-AODA-002. Implement P-AODA-009 RTW Process and FORM-AODA-003. Activate AODA-LOG-004 and AODA-LOG-005.	MR	June 2026	Complete
Employment	Establish a documented procedure for providing individualized workplace emergency response information to employees who require it.	Implement P-AODA-007. Conduct an annual employee self-identification survey. Develop individual plans for any employees who self-identify. No employees have self-identified as of June 2026.	MR	June 2026	Complete
All Standards	Deliver mandatory AODA training to all employees covering the IASR and the Ontario Human Rights Code. Maintain full training records.	Deliver all 5 AODA training modules to all employees in phases across June 2026, with full completion confirmed by month end. Maintain individual records using FORM-AODA-004. Update AODA-LOG-003.	MR	June 2026	Complete
Design of Public Spaces	Conduct a systematic physical accessibility audit of the facility to establish baseline measurements against AODA requirements and identify any improvements needed.	Maintenance Coordinator conducts full on-site physical accessibility audit using AODA-CHK-001. All areas measured against statutory AODA dimensions. Findings reviewed by MR. Priority actions identified and implementation plan prepared.	Maintenance Coordinator / MR	October 2026	In Progress
Design of Public Spaces	Implement priority physical accessibility improvements identified through the facility audit to ensure the facility meets AODA requirements.	Maintenance Coordinator implements priority corrective actions identified in the October 2026 facility audit. Implementation and verification continue into 2027 as part of the ongoing maintenance programme under P-AODA-011.	Maintenance Coordinator	2027	Pending

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Info & Comms	Complete the technical WCAG 2.0 Level AA assessment and remediation of the company website at www.pridepak.com.	P-AODA-013 Website Posting Guidance provides the complete framework for this work. External WCAG 2.0 Level AA technical assessment and remediation executed by the web team and completed by July 2026.	Web Team / MR	July 2026	Complete
Filing	File the overdue 2023 AODA Accessibility Compliance Report with the Ontario government.	File 2023 report through Ontario Accessibility Compliance Reporting Portal using P-AODA-012 guidance. Multi-Year Plan must be posted on website before filing.	Mauro LoRusso / MR	By 15/07/2026	Complete
Filing	File the 2026 AODA Accessibility Compliance Report with the Ontario government.	File 2026 report through Ontario portal using P-AODA-012 guidance. All documents must be implemented and physical improvements from Q3-Q4 audit must be actioned before filing.	Mauro LoRusso / MR	By 31/12/2026	Pending

YEAR 2 - 2027: PHYSICAL COMPLIANCE VERIFICATION AND PROCESS EMBEDDING

Design of Public Spaces	Embed the Physical Accessibility Maintenance SOP into the regular facility maintenance schedule as an ongoing operational programme.	P-AODA-011 fully operational. Weekly, monthly and quarterly checks integrated into facility maintenance schedule. First full annual maintenance report presented at MRM.	Maintenance Coordinator	Q1 2027	Pending
Design of Public Spaces	Verify and confirm that all physical accessibility improvements implemented following the 2026 audit meet AODA statutory requirements through re-measurement and documentation.	Maintenance Coordinator re-measures all corrected areas using AODA-CHK-001. All Pass results confirmed. Any remaining items from the lower-priority list completed. AODA-CHK-001 updated with confirmed compliant measurements.	Maintenance Coordinator	Q1 2027	Pending

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Info & Comms	Conduct first annual re-verification of WCAG 2.0 Level AA conformance following any website updates or content additions made during the year.	Web team re-tests website against WCAG 2.0 Level AA. All new content confirmed accessible. Accessible formats notice and Multi-Year Plan posting verified as compliant.	Web Team / MR	Q2 2027	Pending
All Standards	Embed AODA compliance as a standing agenda item at every Management Review Meeting with formal progress reporting.	AODA compliance review added as permanent standing MRM agenda item. All logs, registers and plan progress reviewed at each MRM. Annual AODA summary report produced by MR.	MR	Q1 2027 and ongoing	Pending
Employment	Conduct the first formal annual review of the IAP and RTW processes after one full year of operation.	MR reviews AODA-LOG-004 and AODA-LOG-005 data. Assesses effectiveness of accommodation processes, average resolution times and outcomes. Improvements implemented and reported at MRM.	MR	Q3 2027	Pending
Employment	Conduct the annual employee self-identification survey for individualized emergency response needs, as required on an ongoing basis under P-AODA-007.	MR distributes the annual self-identification survey to all employees. Any employee who self-identifies receives an individualized emergency response plan developed in consultation with them. AODA-LOG entries updated accordingly.	MR	Q4 2027 and annually thereafter	Pending

YEAR 3 - 2028: STRENGTHENING, REFRESH AND SUPPLY CHAIN ALIGNMENT

All Standards	Deliver first AODA training refresh to all employees to reinforce obligations and incorporate any updates to legislation or company policy.	Full AODA training refresh delivered to all employees. Updated FORM-AODA-004 records completed. AODA-LOG-003 updated. Any changes to IASR or Ontario Human Rights Code incorporated into training content.	MR	Q1 2028	Pending
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Design of Public Spaces	Conduct second annual physical accessibility audit to confirm ongoing compliance and identify any new requirements arising from facility changes.	Maintenance Coordinator completes second full cycle of AODA-CHK-001. All measurements confirmed. Any new gaps from facility changes or updated standards identified and actioned.	Maintenance Coordinator	Q1 2028	Pending
Info & Comms	Conduct re-audit of www.pridepak.com to confirm continued WCAG 2.0 Level AA conformance following any website updates or content additions.	Web team re-tests website against WCAG 2.0 Level AA. All new content confirmed accessible. Accessible formats notice and Multi-Year Plan posting current and compliant.	Web Team / MR	Q2 2028	Pending
Employment	Review and strengthen supplier and contractor accessibility requirements in alignment with McDonald's Supplier Code of Conduct audit cycle.	MR reviews McDonald's accessibility requirements against current AODA programme. Any gaps identified and addressed. Contractor and labour broker accessibility obligations reviewed and updated.	MR	Q3 2028	Pending
Filing	File the 2029 AODA Accessibility Compliance Report with the Ontario government.	File 2029 compliance report through Ontario portal using updated P-AODA-012 guidance. All documents reviewed and current before filing.	Mauro LoRusso / MR	By 31/12/2029	Pending
YEAR 4 - 2029 TO 2030: CONTINUOUS IMPROVEMENT AND PROCUREMENT INTEGRATION					
All Standards	Conduct annual review of all AODA policy and procedure documents to ensure continued accuracy, relevance and legal compliance.	MR reviews all 11 AODA procedure documents, 5 forms and 6 Excel registers. Updates made to reflect any legislative changes, facility changes or lessons learned from MRM reviews.	MR	Annually May each year	Pending

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Design of Public Spaces	Assess whether any planned facility renovation, expansion or construction triggers new obligations under the Design of Public Spaces Standard.	MR and Maintenance Coordinator review any planned facility changes against O.Reg 413/12 requirements. New accessible design requirements incorporated into construction planning and contractor briefs.	MR / Maintenance Coordinator	As required	Pending
All Standards	Deliver second AODA training refresh to all employees in 2030.	Full AODA training refresh delivered to all employees. Updated records completed in AODA-LOG-003. Any updates to IASR, Ontario Human Rights Code or company policy incorporated.	MR	2030	Pending
Employment	Review accessibility considerations in performance management, career development and redeployment practices for employees with disabilities.	MR and supervisors review performance management processes against AODA Employment Standard requirements. IAP process assessed for effectiveness in supporting career development of employees with disabilities.	MR	2030	Pending
YEAR 5 - 2031: FIVE-YEAR REVIEW, PLAN RENEWAL AND NEXT CYCLE LAUNCH					
All Standards	Conduct a comprehensive five-year review of all accessibility goals achieved, barriers removed and progress made against this plan.	MR leads full review of Multi-Year Accessibility Plan 2026–2031. All goals assessed against outcomes. Barriers removed documented. Remaining gaps identified. Lessons learned captured for next plan.	MR	Q1 2031	Pending

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All Standards	Develop and publish the Multi-Year Accessibility Plan 2031 - 2036 as required under O.Reg 191/11 section 4.	New Multi-Year Accessibility Plan developed based on 2026-2031 review outcomes and updated AODA requirements. Plan published on website. Employees were notified. Available in accessible formats.	MR / Web Team	Q2 2031	Pending
All Standards	Conduct a third full AODA training refresh for all employees at the start of the new plan cycle.	Full AODA training refresh delivered. Training content updated to reflect any legislative changes since 2028 refresh. Records completed in AODA-LOG-003.	MR	Q2 2031	Pending

8. Responsibility

The Management Representative is responsible for overseeing the implementation of this plan, reporting on progress at every Management Review Meeting and ensuring the plan is reviewed and updated at least once every five years. The Maintenance Coordinator is responsible for all physical accessibility actions including the facility audit, corrective actions and the ongoing maintenance programme. The web team is responsible for all website accessibility actions. Mauro LoRusso as VP Finance is responsible for ensuring that all AODA compliance reports are filed with the Ontario government on time.

9. Consultation

Pride Pak Canada Ltd. consults with persons with disabilities in developing and reviewing this plan through the accessible feedback mechanism P-AODA-002, the individual accommodation plan process P-AODA-008 and feedback received from McDonald's Canada auditors and other corporate visitors to the facility.

10. Posting and Availability

This Multi-Year Accessibility Plan is published on the Pride Pak Canada Ltd. website at www.pridepak.com in accordance with Ontario Regulation 191/11 section 4. It is available in accessible formats and languages upon request at no cost. A printed copy is available at the reception area of the facility. All employees are notified of this plan through the AODA training programme and through notices posted in all main work areas.

11. Review and Update

This plan is reviewed and updated at least annually at the Management Review Meeting and comprehensively renewed every five years. Progress is assessed against each goal in the plan table above. Where goals are achieved ahead of schedule they are marked Complete. Where new barriers are identified during the plan period they are added to the plan at the next MRM. The next full five-year review and renewal of this plan is due in 2031.

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12. Documentation

All actions, decisions, plans, reviews and updates made under this plan are recorded and retained in Pride Pak Canada Ltd.'s AODA compliance records for a minimum of three years and are available for inspection by the Ontario Accessibility Directorate on request.

13. Appeals Process

Any employee, customer, supplier or visitor who has a concern about the content or implementation of this plan may raise it formally with the Management Representative in writing. The concern will be reviewed by a senior manager as soon as practicable, and Pride Pak Canada Ltd. aims to communicate the outcome in writing within ten working days as an internal service target. The right to raise a concern does not affect any right to file a complaint with the Ontario Human Rights Tribunal or the Accessibility Directorate of Ontario.

14. Confidentiality

All personal information collected in connection with the implementation of this plan including disability-related information and accommodation details is treated with strict confidentiality in accordance with the Ontario Human Rights Code and PIPEDA.

15. Compliance with Ontario Laws and International Standards

- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
- Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR) section 4
- Ontario Regulation 429/07 - Accessibility Standards for Customer Service
- Ontario Regulation 413/12 - Design of Public Spaces Standard
- Ontario Human Rights Code
- Web Content Accessibility Guidelines (WCAG) 2.0 Level AA
- McDonald's Supplier Code of Conduct v4.0 (2024)
- SMETA 7 ETI Base Code - Pillar 1 (Labour)

16. Communication

This plan is communicated to all employees as soon as practicable after they begin employment and is reviewed annually by the Management Representative. It is available in accessible formats upon request at no cost. It is updated as required to reflect changes in legislation, standards, facility layout or company practice.

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